

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARC REICHBART, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER
SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-01876-NIQA

CLASS ACTION

JOSEPH STALLONE, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER
SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-01901-NIQA

CLASS ACTION

ALISON CROTEAU, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER
SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-01946-NIQA

CLASS ACTION

KEVIN BROOKS, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER
SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-02007-NIQA

CLASS ACTION

JESSE R. APTHORP, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER
SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-02024-PD

CLASS ACTION

MICKEY HWANG, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER
SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-02033-NIQA

CLASS ACTION

SOPHIE CAHEN VORBURGER, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER
SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-02045-NIQA

CLASS ACTION

DANA KERR, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER
SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-02075-NIQA

CLASS ACTION

DERRICK VINES and BRADFORD WICKS,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

FINANCIAL BUSINESS AND CONSUMER
SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-02085-NIQA

CLASS ACTION

GRIFFIN R. WAGNER, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER
SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-02119-NIQA

CLASS ACTION

JEROME FRASIER, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER
SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-02121-NIQA

CLASS ACTION

DUSTIN BUSBY, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER
SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-02129-TJS

CLASS ACTION

TIMOTHY COURTNEY, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER
SOLUTIONS, INC. d/b/a FBCS, INC.,

Defendant.

Case No. 2:24-cv-02153-NIQA

CLASS ACTION

ONIEQUE MORGAN, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER
SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-02163-NIQA

CLASS ACTION

**COORDINATED PLAINTIFFS'
AMENDED MOTION TO CONSOLIDATE CASES
AND APPOINT INTERIM CO-LEAD CLASS COUNSEL**

For the reasons set forth in the accompanying Amended Memorandum of Law, Coordinated Plaintiffs Marc Reichbart, Joseph Stallone, Alison Croteau, Kevin Brooks, Mickey Hwang, and Dana Kerr respectfully request that the Court (1) consolidate the above-captioned Related Actions pursuant to Fed. R. Civ. P. 42(a) under the caption of the first-filed *Reichbart* docket, No. 2:24-cv-01876-NIQA, and administratively close the *Stallone*, *Croteau*, *Brooks*, *Apthorp*, *Hwang*, *Cahen Vorburger*, *Kerr*, *Vines*, *Wagner*, *Frasier*, *Busby*, *Courtney*, and *Morgan*

matters; (2) appoint Andrew W. Ferich of Ahdoot & Wolfson, PC, Kristen Lake Cardoso of Kopelowitz Ostrow Ferguson Weiselberg Gilbert, and Charles E. Schaffer of Levin Sedran & Berman, LLP as Interim Co-Lead Class Counsel pursuant to Fed. R. Civ. P. 23(g)(3); (3) appoint Mariya Weekes of Milberg Coleman Bryson Philips Grossman, PLLC, Tyler Bean of Siri & Glimstad LLP, and Jennifer M. French of Lynch Carpenter, LLP to a Plaintiffs' Executive Committee; (4) appoint Benjamin F. Johns of Shub & Johns LLC as Liaison Counsel; and (5) set a deadline for Plaintiffs to file a consolidated complaint within 30 days of an Order granting this motion to appoint counsel and consolidate cases.

A proposed Amended Order has been filed contemporaneously herewith.

Dated: May 22, 2024

/s/ Andrew Ferich

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Proposed Interim Co-Lead Counsel

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Proposed Plaintiffs Executive Committee

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Proposed Plaintiffs Liaison Counsel

**pro hac vice pending or to be filed*

CERTIFICATION PURSUANT TO L. CIV. R. 7.1(d)

In compliance with L. Civ. R. 7.1(d), the undersigned certifies that on this 22nd day of May, 2024, the foregoing amended motion and its accompanying documents were sent via electronic mail to the following counsel for Defendant Financial Business and Consumer Solutions, Inc.:

Nathalie Freeman
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CERTIFICATE OF SERVICE

The undersigned further certifies that on this 22nd day of May, 2024, a true and correct copy of the above and foregoing was filed with the Clerk of Court via the Court's CM/ECF system for electronic service on all counsel of record.

Dated: May 22, 2024

/s/ Andrew Ferich

Andrew Ferich (PA I.D. 313696)